

FILED

Donald Reed
1171 E. Vermont Ave.
Anaheim, CA 92805

2018 AUG 21 PM 3:32

CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF
SANTA ANA

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CVRO 125 BAKER, LLC
Plaintiff,

Case No.:

vs.

SACV18-01487 JVS (KESx)

NOTICE OF REMOVAL OF ACTION

ANISSA BRIDGES,

and DOES 1 to 10, Inclusive

Defendant(s).

To the Clerk of the United States District Court for the Central District of California.

PLEASE TAKE NOTICE that Defendant, Anissa Bridges, hereby removes to this Court, the United States District Court for the Central District of California from the Superior Court of California in and for the County of Orange, and sets forth in support of the Notice of Removal of Action the following:

Pursuant to 28 U.S.C. §1441, Defendant further states as follows:

1. That Defendant is named as defendant in a civil action filed in the Superior Court of California for the County of Orange.

2. The action was commenced by Plaintiff when Plaintiff filed a Summons in the Superior Court of the State of California, County of Orange, bearing case no. 2018-01007775, entitled CVRO 125 BAKER, LLC vs. ANISSA BRIDGES; BARBARA REED; DONALD REED; SHANNON BROWN; and DOES 1 to 10, Inclusive.

1
2 3. Defendant was served with the Summons and Complaint on or about July 25, 2018 true
3 and correct copy attached as Exhibit 1 and incorporated in this notice by reference.

4 4. The following filings of said case are attached hereto and incorporated herein by
5 reference:

6 Exhibit 1: Summons and Complaint for Unlawful Detainer – Eviction
7
8 Complaint, both dated July 25, 2018.

9 5. The above-mentioned action is a civil action of which this court has jurisdiction
10 under 28 U.S.C. §§1332 and 1441 .

11 6. This is a civil action over which this court has original jurisdiction and the action
12 is removable to this court pursuant to 28 U.S.C. §§1441(a), 1343

13
14 **STATEMENT OF FACTS**

15 7. *CVRO 125 BAKER, LLC* is not organized or licensed to do business in California.

16 8. *CVRO 125 BAKER, LLC* is, and at all times relevant to this removal, was the trustee for a
17 securities special purpose vehicle trust, organized for the purchase and sell of securities.


18 9. The purchase and sell of securities involved, unknowingly, defendant's property
19 which was a federally related mortgage.

20 10. *CVRO 125 BAKER, LLC*, knowingly was not, and at all times relevant to this removal, is
21 not the real party in interest, both before and after the sale of defendants property.

22 11. The sell of defendant's property was a sham, however defendant will not be able
23 to receive a fair hearing or trial in the state Superior Court for Orange County in that she will
24 be denied due process because the Superior Court for Orange will ignore any evidence if there is a
25 trustee's deed upon sell, whether valid or invalid, denying defendant an opportunity to be heard.
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1 WHEREFORE, Defendant prays that the above action now pending in the Orange
2 Superior Court of the State of California, bearing case no. 2018-01007775, entitled CVRO 125
3 BAKER, LLC vs. ANISSA BRIDGES; BARBARA REED; DONALD REED; SHANNON BROWN; and DOES
4 1 to 10, Inclusive.

7 Date: August 21, 2018

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10 DONALD REED
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12 Defendant, *In propria persona*

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Exhibit 1

UD-100

1. ORIGINALLY OR PRIMARILY WITHOUT ATTORNEY (Name, State Bar number, and address): — Shelley M. Crawford #219957/Kristin Molloy #260147 Kimball, Tirey & St. John LLP 2040 Main Street, Suite 500 Irvine, CA 92614 TEL: (949) 476-5585 FAX NO. (Optional): (949) 476-5580 E-MAIL ADDRESS (Optional): OCefiling@kts-law.com ATTORNEY OR PARTY: Plaintiff	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California, County of Orange 07/25/2018 at 10:51:29 AM Clerk of the Superior Court By Diana Cuevas, Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Orange STREET ADDRESS: 4601 JAMBOREE RD, SUITE 104 MAILING ADDRESS: CITY AND ZIP CODE: NEWPORT BEACH, CA 92660 BRANCH NAME: HARBOR JUSTICE CENTER PLAINTIFF: CVRO 125 BAKER, LLC DEFENDANT: Anissa Bridges	
<input checked="" type="checkbox"/> DOES 1 TO 10 inclusive	
COMPLAINT - UNLAWFUL DETAINER* <input checked="" type="checkbox"/> COMPLAINT <input type="checkbox"/> AMENDED COMPLAINT (Amendment Number): _____	CASE NUMBER 30-2018-01007775-CL-UD-HNB
Jurisdiction (check all that apply): <input checked="" type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input checked="" type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000 but does not exceed \$25,000 <input type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (amount demanded exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint or cross-complaint (check all that apply): <input type="checkbox"/> from unlawful detainer to general unlimited civil (possession not in issue) <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlawful detainer to general limited civil (possession not in issue) <input type="checkbox"/> from unlimited to limited	

1. PLAINTIFF (name each): CVRO 125 BAKER, LLC

alleges causes of action against DEFENDANT (name each):
 Anissa Bridges

2. a. Plaintiff is (1) ☐ an individual over the age of 18 years. (4) ☐ a partnership.
 (2) ☐ a public agency. (5) ☐ a corporation.
 (3) ☒ other (specify): Limited Liability Company

b. ☐ Plaintiff has complied with the fictitious business name laws and is doing business under the fictitious name of (specify):

3. Defendant named above is in possession of the premises located at (street address, apt. no., city, zip code, and county):

125 E. Baker St. #440
 Costa Mesa, CA 92626
 County of Orange

4. Plaintiff's interest in the premises is ☒ as owner ☐ other (specify):

5. The true names and capacities of defendants sued as Does are unknown to plaintiff.

6. a. On or about (date): 5/25/2018 defendant (name each):
 Anissa Bridges

(1) agreed to rent the premises as a ☐ month-to-month tenancy ☒ other tenancy (specify): 14 Months

(2) agreed to pay rent of \$ 3,290.00 payable ☒ monthly ☐ other (specify frequency):

(3) agreed to pay rent on the ☒ first of the month ☐ other day (specify):

b. This ☒ written ☐ oral agreement was made with

(1) ☐ plaintiff. (3) ☐ plaintiff's predecessor in interest.

(2) ☒ plaintiff's agent. (4) ☐ other (specify):

*NOTE: Do not use this form for evictions after sale (Code Civ. Proc., § 1161a).

Page 1 of 3

Form Approved for National Use
 Judicial Council of California
 UD-100 (Rev. July 1, 2015)

COMPLAINT - UNLAWFUL DETAINER

Civil Code, § 1946 et seq.
 Code of Civil Procedure, §§ 125.12-125.116
www.courtinfo.ca.gov

CEB Essential
 Forms

18-3178296

PLAINTIFF (Name): CVRO 125 BAKER, LLC	CASE NUMBER:
DEFENDANT (Name): Anissa Bridges	

9. ☐ Plaintiff demands possession from each defendant because of expiration of a fixed-term lease.
10. ☐ At the time the 3-day notice to pay rent or quit was served, the amount of **rent due** was \$
11. ☒ The fair rental value of the premises is \$ 109.66 per day.
12. ☐ Defendant's continued possession is malicious, and plaintiff is entitled to statutory damages under Code of Civil Procedure section 1174(b). (State specific facts supporting a claim up to \$600 in Attachment 12.)
13. ☒ A written agreement between the parties provides for attorney fees.
14. ☐ Defendant's tenancy is subject to the local rent control or eviction control ordinance of (city or county, title of ordinance, and date of passage):

Plaintiff has met all applicable requirements of the ordinances.

15. ☐ Other allegations are stated in Attachment 15.
16. Plaintiff accepts the jurisdictional limit, if any, of the court.

17. PLAINTIFF REQUESTS

- a. possession of the premises.
- b. costs incurred in this proceeding:
- c. ☐ past-due rent of \$
- d. ☒ reasonable attorney fees.
- e. ☒ forfeiture of the agreement.
- f. ☒ damages at the rate stated in item 11 from (date): 08/01/2018 for each day that defendants remain in possession through entry of judgment.
- g. ☐ statutory damages up to \$600 for the conduct alleged in item 12.
- h. ☐ other (specify):
18. ☒ Number of pages attached (specify): 11

UNLAWFUL DETAINER ASSISTANT (Bus. & Prof. Code, §§ 6400-6415)

19. (Complete in all cases.) An unlawful detainer assistant ☒ did not ☐ did for compensation give advice or assistance with this form. (If plaintiff has received **any** help or advice for pay from an unlawful detainer assistant, state:)

- a. Assistant's name:
- b. Street address, city, and zip code:
- c. Telephone No.:
- d. County of registration:
- e. Registration No.:
- f. Expires on (date):

Date: 07/24/2018

Shelley M. Crawford, Bar #219957

(TYPE OR PRINT NAME)

► /s/ Shelley M. Crawford

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

VERIFICATION

(Use a different verification form if the verification is by an attorney or for a corporation or partnership.)

I am the plaintiff in this proceeding and have read this complaint. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

► See attached verification

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF)

VERIFICATION

I, Lupe Ruiz, declare that:

That I am the Agent for Seaside Meadows Partners dba Seaside at Laguna Heights, the Plaintiff in this action, and am authorized to make this Verification for and on its behalf. I am making this Verification for the Plaintiff because I am the person with the most personal knowledge of the facts contained in this Complaint.

I have read the contents of the foregoing Complaint and the same is true of my own knowledge, except as to those matters stated on information and belief, and as to those, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 29 of July 2018, at 31 Seaport California.



Lupe Ruiz,
Authorized Agent for Plaintiff

1 State of California)

2)ss. **CERTIFICATE OF SERVICE**

3 County of Los Angeles)

4 On August 21, 2018, I, Daniel Walters, do hereby certify that I am over the age of
5 eighteen (18), and not an interested party to the above referenced issue, and I deposited in the
6 mail at County of Los Angeles, California, a true and correct copy of the following document:
7

8 **"NOTICE OF REMOVAL OF ACTION"** and a signed copy of this declaration, via first class
9 mail, with postage pre-paid and addressed to the following:

10 Attn:

11 Kimball, Tirey & St. John LLP
12 2040 Main Street #500
13 Irvine, CA 92614

14 (Attorney for CVRO 125 BAKER, LLC)

15
16 I certify and declare under penalty of perjury that the foregoing is true and correct.

17 Date: August 21, 2018

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19 Daniel Walters
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